

# Fact Sheet



## For Final Renewal Permitting Action Under 45CSR30 and Title V of the Clean Air Act

Permit Number: **R30-00900012-2012**  
Application Received: **May 27, 2011**  
Plant Identification Number: **03-54-009-00012**  
Permittee: **Ardagh Metal Packaging USA Inc.**  
Mailing Address: **3030 Birch Drive, Weirton, WV 26062**

---

Physical Location:	Weirton, Brooke County, West Virginia
UTM Coordinates:	531.834 km Easting • 4470.823 km Northing • Zone 17
Directions:	Located at Half Moon Industrial Park – US Route 22 to Half Moon Road to Signode Road.

---

### Facility Description

Ardagh Metal Packaging USA Inc. (Weirton Plant) manufactures metal packing for the food and pet food industry and has a SIC Code 3411 and a NAICS Code 332431. The Weirton Plant has four (4) coating lines with three thermal oxidation systems with heat recovery. The operating lines (Line Nos. 1 through 4) include the coating operation, drying operation, and the emission control. The equipment is fed uncoated sheets of metal, applies the coating, dries the coating, and restacks the sheets. The only difference with the lines is that Line No. 4 operates in line with the existing Litho Coating Line. The Litho Coating Line is a printer, which prints on the sheet metal prior to the coating being applied in the coating portion of the operation. The facility receives rolls of sheet metal, cuts the sheets, prints and coats the sheets, dries the coatings and then restacks the sheets. The coated sheets are the final product. The site also makes can ends from the sheet metal. The facility has the potential to operate twenty-four (24) hours per day, seven (7) days per week and fifty-two (52) weeks per year. The facility consists of a cutting area, a coating area with four sheet coaters, four ovens, and three incinerators, and an end press area with six end stampers.

## Emissions Summary

Plantwide Emissions Summary [Tons per Year]		
Regulated Pollutants	Potential Emissions	2010 Actual Emissions
Carbon Monoxide (CO)	9.9	4.8
Nitrogen Oxides (NO <sub>x</sub> )	9.2	5.71
Particulate Matter (PM <sub>2.5</sub> )	0.92	0.43
Particulate Matter (PM <sub>10</sub> )	0.92	0.43
Total Particulate Matter (TSP)	0.92	0.43
Sulfur Dioxide (SO <sub>2</sub> )	0.08	0.04
Volatile Organic Compounds (VOC) <sup>1</sup>	141.75	58.26
<i>PM<sub>10</sub> is a component of TSP.</i>		
Hazardous Air Pollutants	Potential Emissions	2010 Actual Emissions
Total HAPs <sup>2</sup>	23.32	12.8
<i>Some of the above HAPs may be counted as PM or VOCs.</i>		

<sup>1</sup> The difference in the VOC potential emissions between the first and second renewal is that several of the coating materials used during the first renewal are not being used. Based on future production and client specifications, the estimated annual usage (gallons) for some of the individual coatings has also changed. The combination of changes in materials and estimated annual usage resulted in the difference of VOC potential emissions.

<sup>2</sup> The HAP potential emissions is a snapshot of the various coatings that the facility anticipates using in the future based on customer requests, see Section 4.1.7 of the permit for coatings list. HAP potential emissions shall not exceed 10 tons per year of any individual HAP or 25 tons per year of all combined HAPs as stated in Section 4.1.10 of the permit. Possible HAP emissions are listed in Section 4.1.8.b of the permit. Additional coatings and HAPs (other than those listed in Section 4.1.8.b) may be approved by the Director through permit determinations (see Section 4.1.8.a.).

## Title V Program Applicability Basis

This facility has the potential to emit 141.75 tons of VOC per year. Due to this facility's potential to emit over 100 tons per year of a criteria pollutant, Ardagh Metal Packaging USA Inc. is required to have an operating permit pursuant to Title V of the Federal Clean Air Act as amended and 45CSR30.

## Legal and Factual Basis for Permit Conditions

The State and Federally-enforceable conditions of the Title V Operating Permits are based upon the requirements of the State of West Virginia Operating Permit Rule 45CSR30 for the purposes of Title V of the Federal Clean Air Act and the underlying applicable requirements in other state and federal rules.

This facility has been found to be subject to the following applicable rules:

Federal and State:	45CSR6	Open burning prohibited.
	45CSR11	Standby plans for emergency episodes.
	45CSR13	Permits for Construction, Modification, Relocation and Operation of Stationary Sources of Air Pollutants, Notification Requirements, Temporary Permits, General Permits, and Procedures for Evaluation
	WV Code § 22-5-4 (a) (14)	The Secretary can request any pertinent information such as annual emission inventory reporting.
	45CSR30	Operating permit requirement.
	40 C.F.R. Part 61	Asbestos inspection and removal
	40 C.F.R. Part 64	Compliance Assurance Monitoring (CAM)
	40 C.F.R. Part 82, Subpart F	Ozone depleting substances
State Only:	45CSR4	No objectionable odors.

Each State and Federally-enforceable condition of the draft Title V Operating Permit references the specific relevant requirements of 45CSR30 or the applicable requirement upon which it is based. Any condition of the draft Title V permit that is enforceable by the State but is not Federally-enforceable is identified in the draft Title V permit as such.

The Secretary's authority to require standards under 40 C.F.R. Part 60 (NSPS), 40 C.F.R. Part 61 (NESHAPs), and 40 C.F.R. Part 63 (NESHAPs MACT) is provided in West Virginia Code §§ 22-5-1 *et seq.*, 45CSR16, 45CSR34 and 45CSR30.

## Active Permits/Consent Orders

Permit or Consent Order Number	Date of Issuance	Permit Determinations or Amendments That Affect the Permit ( <i>if any</i> )
R13-2410C	October 10, 2008	

Conditions from this facility's Rule 13 permit(s) governing construction-related specifications and timing requirements will not be included in the Title V Operating Permit but will remain independently enforceable under the applicable Rule 13 permit(s). All other conditions from this facility's Rule 13 permit(s) governing the source's operation and compliance have been incorporated into this Title V permit in accordance with the "General Requirement Comparison Table B," which may be downloaded from DAQ's website.

## Determinations and Justifications

Since R30-00900012-2006 (MM01) was issued, Ardagh Metal Packaging USA Inc. submitted two permit determinations, PD10-55 and PD10-76. These determinations did not result in any changes to the conditions of the Title V permit. The specific details of the permit determinations are discussed below.

The following updates were made in the renewal.

1. PD10-055 was for the addition of a coating material PPG2521401 Buff Organosol that contains a HAP known as o-Cresol. According to Section 4.1.8 of the Title permit V, the company is required to notify DAQ of a HAP that is not listed in this section. No permit was required since the emission limit increases were below six (6) lb/hr and ten (10) TPY of VOC and 2 lb/hr or 5 TPY of HAPs as set forth in 45CSR§§13-2.17.a&b.
2. PD10-076 was for the addition of a coating material APPERTA that contains a HAP known as Phenol. According to Section 4.1.8 of the Title permit V, the company is required to notify DAQ of a HAP that is not listed in this section. No permit was required since the emission limit increases were below six (6) lb/hr and ten (10) TPY of VOC and 2 lb/hr or 5 TPY of HAPs as set forth in 45CSR§§13-2.17.a&b.

The following updates were made in this Title V renewal:

1. Impress USA, Inc. has changed its name to Ardagh Metal Packaging USA Inc. All references to Impress USA, Inc. were revised to reflect the facility new name of Ardagh Metal Packaging USA Inc. (Ardagh).
2. The regulatory language was updated for Sections 3.1.1 and 3.1.2, 45CSR§§6-3.1 and 3.2.
3. 45CSR34 incorporates and is now cited with 40 C.F.R. Part 61 because 45CSR15 was repealed. The citation for 3.1.3 has been revised accordingly.
4. The boilerplate language for Section 3.3.1 was revised with the addition of Section 3.3.1.d and the citation was also revised to expand the authority of the West Virginia state code.
5. Sections 3.5.3 and 3.5.5 were revised according to US EPA Region 3's request that all annual compliance certifications be submitted electronically (e-mail). Also, the US EPA Region 3 address in Section 3.5.3 was revised. This is a general change to the boiler plate language.
6. Section 4.3.2 was revised by removing "Within 180 days of the issuance of R13-2410B (October 5, 2006) and" since this requirement of Section 4.3.2 has been completed.
7. Ardagh conducted their five year test as required by Section 4.3.2 on December 6 through December 8, 2011 to determine the VOC capture and destruction efficiency, which is noted in the section.
8. Section 5.2.1 was revised. The facility had conducted monthly visible emission checks for three months upon the issuance of R30-00900012-2006 and no visible emissions were detected; therefore, the facility is currently conducting visible emissions checks semi-annually.
9. Sections 5.2.3 – 5.2.10, 5.4.5 - 5.4.7, 5.5.2, 5.7, 5.8, and 5.9 replace Sections 6.0, 7.0 and 8.0 for the thermal oxidizers CAM requirements.
10. Section 5.4.2 was removed since this requirement exists in Sections 5.2.2 and 5.4.6.a. The remaining sections were renumbered accordingly.

Ardagh Metal Packaging USA Inc. has not modified this facility that it would trigger a PSD permit for GHG.

### Non-Applicability Determinations

The following requirements have been determined not to be applicable to the subject facility due to the following:

<b>40 C.F.R. Part 60 Subpart TT</b>	Standards of Performance for Metal Coil Surface Coating defines metal coil surface coating operation as the application system used to apply an organic coating to the surface of any continuous metal strip with thickness of 0.15 millimeter or more that is packaged in a roll or coil. This facility cuts the metal coils prior to coating, and as such, is not subject to 40 C.F.R. Part 60 Subpart TT.
<b>40 C.F.R. Part 63 Subpart KKKK</b>	National Emission Standards for Hazardous Air Pollutants: Surface Coating of Metal Cans. The Ardagh Metal Packaging USA Inc. Weirton Plant reduced their HAP emission limitations (per permit R13-2410B) by modifying their use of coatings, cleaners, pastes and thinners to become a synthetic minor source under 40 C.F.R. Part 63 Subpart KKKK.

### Request for Variances or Alternatives

None

### Insignificant Activities

Insignificant emission unit(s) and activities are identified in the Title V application.

### Comment Period

Beginning Date: February 17, 2012  
Ending Date: March 19, 2012

All written comments should be addressed to the following individual and office:

Wayne Green  
Title V Permit Writer  
West Virginia Department of Environmental Protection  
Division of Air Quality  
601 57<sup>th</sup> Street SE  
Charleston, WV 25304

### Procedure for Requesting Public Hearing

During the public comment period, any interested person may submit written comments on the draft permit and may request a public hearing, if no public hearing has already been scheduled. A request for public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing. The Secretary shall grant such a request for a hearing if he/she concludes that a public hearing is appropriate. Any public hearing shall be held in the general area in which the facility is located.

## **Point of Contact**

Wayne Green  
West Virginia Department of Environmental Protection  
Division of Air Quality  
601 57<sup>th</sup> Street SE  
Charleston, WV 25304  
Phone: 304/926-0499 ext. 1258 • Fax: 304/926-0478

## **Response to Comments (Statement of Basis)**

Not applicable.